IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RICHARD STOECKLIN and	)	
PINDAI STOECKLIN,	)	
	)	
Plaintiffs,	)	NO. 08 C 3243
	)	
v.	)	JUDGE PALLMEYER
	)	
CITY OF CHICAGO and	)	MAGISTRATE JUDGE VALDEZ
UNNAMED CHICAGO POLICE	)	
OFFICERS,	)	
	)	
Defendants.	)	

CITY OF CHICAGO'S AGREED MOTION TO EXTEND
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD

Defendant, the City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel, respectfully asks this Honorable Court for an extension of time up to and including July 28, 2008, in which to answer or otherwise plead to Plaintiff's Complaint.

In support of this motion, Defendant states:

1.   This matter was filed on June 5, 2008, in the United States District Court, Northern District of Illinois. ACC Rita Moran was assigned the case on behalf of the City on June 26, 2008.

2.   The undersigned has not yet received any of the Chicago Police Department records to enable Defendant to properly respond to Plaintiff's Complaint.

3.   This motion is Defendant's first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

4.   Plaintiff's counsel was informed of this motion on June 27, 2008, and agrees

with its terms.

WHEREFORE, Defendant, City, respectfully asks for an order extending the time to

answer or otherwise plead to July 28, 2008.

Respectfully Submitted,

MARA S. GEORGES
CORPORATION COUNSEL

BY: **/s/ Rita Moran**
RITA MORAN
Assistant Corporation Counsel
Attorney for Defendant City

30 N. LaSalle Street
Suite 1020
Chicago, IL 60602
(312) 744-4939
Attorney No. 06270301

CERTIFICATE OF SERVICE

I, Rita Moran, an attorney, hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 27th day of June, 2008.

/s/ Rita Moran
RITA MORAN